

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EN MAY MARITIME LLC,

Plaintiff,

- against -

PROIOS S.A.,

Defendant.

Case No. 24-cv-6738 (PKC)

**DECLARATION OF JORGE PROIOS IN SUPPORT OF MOTION OF AXIÓN
MANAGEMENT SHIP LLC TO RELEASE FUNDS FROM ATTACHMENT**

This declaration is submitted as part of Axión Management Ship LLC's **restricted appearance pursuant to Rule E(8)** of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure.

I, Jorge Proios, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am the member of Axión Management Ship LLC ("Axión"), a limited liability company organized and existing under the law of Delaware.
2. I make this declaration based upon my personal knowledge, in support of Axión's motion to release funds that were attached while in Axión's bank account at Interaudi Bank.
3. Axión was established in 2013 and provides global marine services to ship owners and managers. Among other things, Axión supplies marine general stores, including food and supplies needed on board vessels, as well as spare parts. Axión also represents shipyards located in the Asia-Pacific region, Europe, South America, and South Africa, for new building, conversion, and drydocking repairs of vessels. Axión also offers technical services, such as supervision and coordination of conversion and repairs of vessels, surveys and inspections, ultrasonic

measurements approved by classification societies, preparation and evaluation of repair specifications, and structural assessment.

4. Axi3n opened and has maintained an account with the Miami Branch of Inter Audi Bank. Statements issued by Inter Audi Bank state that Axi3n's account is with the "Miami Branch" and that "All accounts in Customer Branch unless otherwise noted." For example, below is a true copy of an excerpt of the statement through August 30, 2024 (balances redacted), for Axi3n's account with Inter Audi Bank:.

INTERAUDI BANK Direct inquiries to: 19 East 54th Street, New York, NY 10022 | Tel 212 833 1000 **MEMBER F.D.I.C.**

Statement Closing Date : 08/30/24
Page : 1

643973
AXION MANAGEMENT SHIP LLC

ACCOUNT SUMMARY	
Account Number and Description	Balance
643973 401 01 Checking Accounts	
643973 401 01 Checking Accounts	

All accounts in US\$ unless otherwise stated
All accounts in Customer Branch unless otherwise stated
Branch : Miami Branch
Currency : U.S. Dollar
Type : Checking Accounts
Account number : 643973/401/001/006/01
Statement period : 08/01/24 - 08/31/24

5. Axi3n has never opened or maintained an account with the New York location of Inter Audi Bank.

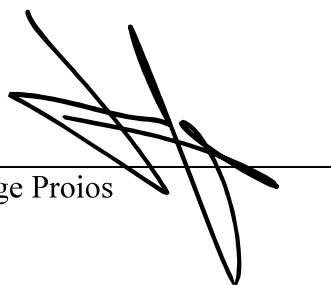
6. I understand that the funds in Axi3n's account at the Miami Branch of Inter Audi Bank were attached on or about September 13, 2024. Exhibit A to this Declaration is a true copy of the Process of Maritime Attachment and Garnishment that Axi3n received from Inter Audi Bank.

7. Although funds relating to the contract for repairs to the vessel *En May* were sent to Axi3n's account at Inter Audi Bank, the account is also used for transactions that are unrelated to Proios S.A.

8. The funds that were attached from Axi3n's bank account include funds that do not belong to Proios S.A. and instead are funds in which Axi3n has an interest.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on the 11th day of October 2024 at Buenos Aires, Argentina.



Jorge Proios